



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023**

April 5, 2007

Mr. Richard Gates, Remediation Project Manager
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's February 19, 2007, submittal titled
Supplemental Sampling Plan for Re-routing of Sanitary and Storm Water Pipelines, GE-
Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's February 19, 2007, submittal titled *Supplemental Sampling Plan for Re-routing of Sanitary and Storm Water Pipelines* (the "Sampling Plan"). This letter is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, in consultation with the Massachusetts Department of Environmental Protection, approves the Sampling Plan, subject to the following conditions:

1. GE shall collect soil borings at proposed sampling stations 2 and 11, and analyze the samples for PCBs at the 0-1, 1-6, and 6-15 foot depth increments. The pre-design PCB data from existing soil borings RAA9-J12 and H78B-25 do not satisfy the data needs for proposed sampling stations 2 and 11 as they appear to be located further than 25 feet from the center-line of the proposed sanitary sewer pipeline.
2. Existing pre-design sample RAA9-J10 indicated PCBs in the 0- to 1-foot depth increment at levels above the "not-to-exceed" (NTE) criteria for unpaved soils within the GE facility. As a result, as part of future Removal Design/Removal Action (RD/RA) activities, the polygon associated with this sample will be designated for removal. Therefore, future utility-related evaluations shall not include the potential re-use of these NTE soils. GE shall excavate and segregate the soils from the RAA9-J10 polygon for proper disposal prior to the start of the utility-related excavations.
3. GE shall analyze for Appendix IX+3 constituents at least one sample collected from below 15 feet at each of the proposed sampling stations 3, 5, 8, 12, 13, and 15.

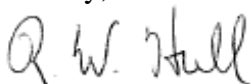
4. GE shall compare the location and depths of the proposed utility corridor to the results of any existing geophysical testing, including the information from GE's July 9, 2002, report titled Hill 78 On-Plant Consolidation Area Geophysical Testing Results and Proposed Deep Soil Borings, to determine the possible presence of voids or anomalies within the proposed utility corridor. This comparison shall be shown on a figure overlaying the proposed utility corridor with the results of the geophysical testing referenced above and identify the location of any potential voids or anomalies within the proposed utility corridor.
5. GE shall specify what administrative measures will be taken to ensure that appropriate modifications are made to applicable City of Pittsfield easements following relocation of the pipelines.

GE shall comply with all applicable existing local, state and federal requirements for the installation of the storm water and sewer lines. This letter shall not affect any of GE's obligations under the Clean Water Act, including, without limitation, its obligations under any National Pollutant Discharge Elimination System (NPDES) permit or under any regulations promulgated under the Clean Water Act.

GE shall complete the supplemental sampling proposed in the Sampling Plan, as conditioned by paragraphs 1 and 3 above, and submit a Supplemental Sampling and Engineering Design Report within 90 days of the date of this letter. The Supplemental Sampling and Engineering Design Report shall also address the conditions from paragraphs 2, 4, and 5, above, as well as the requirements specified in EPA's January 5, 2007, approval letter. EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1882.

Sincerely,



Richard W. Hull
GE Facility Project Manager

cc:

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